UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

In re Bair Hugger Forced Air Warming Products Liability Litigation

MDL No. 15-2666 (JNE/FLN)

This Document Relates To: ALL CASES

DEFENDANTS' RULE 7.1(F)
CERTIFICATE OF COMPLIANCE

I, Benjamin W. Hulse, certify that Defendants' Reply ("Reply Memorandum") in Support of Motion for Summary Judgment with Respect to General Causation complies with the limits of Local Rule 7.1(f) and with the type-size limit of Local Rule 7.1(h).

I further certify that, in preparation of the above document, I used Microsoft Word 2016, and that this word processing program has been applied specifically to include all text, including headings, footnotes, and quotations in the following word count.

I further certify that the above-referenced Reply Memorandum contains 5093 words, and that with Defendants' initial Memorandum of 5603 words, the two documents combined contain 10,696 words.

Dated: October 17, 2017 Respectfully submitted,

s/Benjamin W. Hulse

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